

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

FILED

MAY 03 2019

Clerk, U. S. District Court
Eastern District of Tennessee
at Knoxville

IN THE MATTER OF THE SEARCH OF:)
THE RESIDENCES AT 800 WASHBURN)
AVENUE, KNOXVILLE 37919; 200 EAST)
QUINCY AVENUE, KNOXVILLE, TN)
37917; AND THE REAR WEST)
APARTMENT AT 618 MIDLAKE DRIVE,)
KNOXVILLE, TN 37918)

CASE NO. 3:19-MJ- 1051

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Peter G. Wooden, being duly sworn, state the following information to be true to the best of my knowledge, information and belief:

INTRODUCTION

1. I am a Special Agent of the Drug Enforcement Administration ("DEA"), United States Department of Justice. I have been so employed since September 2010. As such, I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2507(7), and am empowered by law to conduct investigations and to make arrest for offenses enumerated in 18 U.S.C. § 2516.
2. My experience as a Special Agent includes, but is not limited to, conducting physical surveillance, interviewing witnesses, writing affidavits for and executing search warrants, working with undercover agents and informants, issuance of administrative and federal grand jury subpoenas, analysis of phone toll and financial records, and analysis of data derived from the use of pen registers, trap and traces, and wiretaps.
3. I have received training and have experience in the investigation of violations of the federal drug and money-laundering laws. As a result, I am familiar with matters including the

means and methods used by persons and drug trafficking organizations (“DTOs”) to purchase, transport, store, and distribute drugs, and to hide profits generated from those transactions. I also have experience in analyzing and interpreting drug codes and cryptic dialogue used by drug traffickers. In addition, I am also aware that it is common for members of DTOs to possess firearms in furtherance of their drug trafficking activities. In addition, it is also common to use electronic devices such as computers, cellular telephones, and other electronic means to communicate and store information relating to the DTO and the trafficking of drugs.

4. I have personally participated in the investigation set forth below. I am familiar with the facts and circumstances of the investigation through my personal participation, from discussions with other agents and task force officers with various agencies involved in the investigation and from my review of records and reports relating to the investigation. This was a joint investigation between DEA, Knoxville Police Department (KPD)’s Organized Crime Unit, High Intensity Drug Trafficking Area (HIDTA)’s Drug Related Death Task Force, including but not limited to the aforementioned agencies, Knox County Sheriff’s Office and TBI. All information within this affidavit is from my own personal participation in the investigation, discussions directly with law enforcement officers conducting the interviews and other investigation steps in this investigation, and review of various videos of pole cam footage, reports from tracking devices, and other related investigative tools.

5. I am submitting this affidavit in support of an application for a warrant to search the following locations: 800 Washburn Street, Knoxville, TN 37919, as more fully described in Attachment A (hereinafter “TARGET LOCATION A”), 200 East Quincy Avenue, Knoxville, TN 37917, as more fully described in Attachment B (hereinafter “TARGET LOCATION B”),

and rear west apartment at 618 Midlake Drive NE, Knoxville, TN 37918, as more fully described in Attachment C (hereinafter "TARGET LOCATION C").

6. Because this affidavit is being submitted for the limited purpose of establishing probable cause for a search warrant authorizing the search of TARGET LOCATION A, TARGET LOCATION B, and TARGET LOCATION C, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause to believe that TARGET LOCATION A, TARGET LOCATION B, and TARGET LOCATION C, contain evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 846, and 841(a)(1), and Title 18, United States Code, Section 922, as further described in Attachment D.

PROBABLE CAUSE

7. On September 28, 2018, a Knoxville Police Department ("KPD") officer conducted a traffic stop on a vehicle leaving 1715 Connecticut Ave, Knoxville, TN 37921, a suspected drug house. The driver of the vehicle, Tanya L. Chambers, a/k/a "Tanya Galyon" ("GAYLON"), and the front seat passenger, Stephen M. Goforth ("GOFORTH"), were ultimately found to be in possession of approximately twenty-five grams of suspected heroin. In addition to the drugs, GALYON and GOFORTH were found to be in possession of two digital scales, a ledger that appeared to detail monies owed and paid by drug customers, and \$2,995 in U.S. currency. GALYON and GOFORTH were each in possession of a cell phone at the time of their arrest. Both provided voluntary consent for officers to extract and examine the data stored within those cell phones. Officers used the Cellebrite Universal Forensic Extraction Device (UFED) to extract the data and prepare reports of the contents of the phones. Following their arrests, GALYON and GOFORTH have cooperated with law enforcement and provided separate

statements regarding their source of supply and involvement in a drug trafficking organization. The drugs were sent to the Tennessee Bureau of Investigation Crime Laboratory ("TBI Lab") for testing and found to be a combination of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

GOFORTH INTERVIEW

8. On October 17, 2018, investigators conducted an interview of GOFORTH regarding the September arrest. GOFORTH stated that his primary source of supply of heroin was a black male from Detroit, MI, who used the street name "Fuji." GOFORTH stated that "Fuji" frequently stayed in hotels in the north Knoxville area and used local taxicabs for transportation. GOFORTH stated that all of his dealings with "Fuji" are facilitated by GALYON, who is his cousin. GOFORTH stated that he and GALYON had been obtaining heroin from "Fuji" since March or April of 2018. He said that he both uses and sells the heroin he obtains from "Fuji". GOFORTH stated that when he and GALYON first began obtaining heroin from "Fuji," they were getting approximately ten grams at a time at a price of \$100 per gram. GOFORTH stated that at the time of his arrest, he and GALYON were each obtaining 20-23 grams of heroin from "Fuji" several times per week. He stated that the heroin that was seized from him during his arrest was heroin that was obtained from "Fuji." GOFORTH stated that "Fuji's" phone number was stored under the name "Fuji" in the phone that was seized from him during his arrest. Investigators re-examined the content of the data extracted from GOFORTH's phone and found that the content is corroborative of the information he provided during the proffer. Investigators observed the contact named "Fuji" using telephone number 865-963-2095. Message exchanges within GOFORTH's phone show his involvement in the conspiracy with "Fuji" and others to distribute heroin.

GALYON INTERVIEW

9. On January 14, 2019, investigators conducted an interview with GALYON regarding her involvement in this drug trafficking organization ("DTO"). GALYON said that her primary source of supply is a black male from Detroit who she knows as "Fuji." She stated that she met "Fuji" in May of 2018. She stated that she was working as a call girl on Backpage.com and met "Fuji" as a customer. GALYON said that she first met him at the Red Roof Inn on Merchants Drive. GALYON said that she and "Fuji" discussed her selling heroin as a means of making income and she agreed to work for him in that capacity. She said that at first, "Fuji" gave her 5-10 grams of heroin to sell and he expected a \$100 per gram return on the heroin and she could keep the profit. She said that "Fuji" directed customers to her. GALYON said that she started selling from Tina Berry's ("BERRY") residence at 1715 Connecticut Avenue, which is the house she was leaving when she was arrested in September of 2018. GALYON said that she quickly began to obtain 10 grams of heroin every two days from "Fuji." GALYON said that after selling to customers provided by "Fuji" for approximately two to three weeks, she decided to branch out to new customers. To do so, GALYON sent texts to people from whom she previously purchased Opanas, offering to supply them with heroin. After getting new customers, she quickly began obtaining 40-50 grams of heroin per week from "Fuji." GALYON said she would meet with "Fuji" every day to either obtain heroin or pay him. She said that she usually met him at the Red Roof Inn on Merchants Drive or the Extended Stay Motel on N. Peters Road and that he frequently traveled in taxi cabs. GALYON said she and "Fuji" started using other locations to drop off heroin and pick up money. She said they had an associate named Brandy Welch who

lived on Meadowbrook Circle and “Fuji” began using Welch's residence as a drop point. She said “Fuji” would drop off heroin in the bathroom of Welch’s residence and she would then go pick up the heroin to sell. GALYON said Welch was paid ½ gram of heroin for allowing the drops to take place. GALYON said two days before she was arrested in September, she picked up two 25 gram packages from Welch’s residence that were dropped off by “Fuji,” and that the heroin she was arrested with was one of those 25 gram packages. She also provided that the heroin that GOFORTH had was what was left of the other 25 gram package. GALYON also stated that the \$2,995 in U.S. currency seized that day was money she had made from selling heroin out of the 25 gram package.

10. GALYON stated she believed that “Fuji’s” real name was “Damien” and that he had a brother named “Darius.” She further provided the names and addresses or general locations of customers of hers that also sell heroin. The following is a list of those customers. This is not an exhaustive list, but what GALYON could remember at the time of the interview:

- Tina Berry, lives at 1715 Connecticut Avenue, Knoxville, TN
- Alex Stinnett, a deaf white male who was incarcerated at the time
- April Berry, daughter of Tina Berry and lives at Building 11 at Big Oak Apartments
- Rhonda Dukes
- Josh Cooper, lives in the apartments off Jacksboro Pike, north of Central High School
- Mindy Sanchez, Clinton, TN
- Steve and Jessica Bouvier, live at 225 Nicely Trail, Knoxville, TN
- Brandy Welch, 7128 Meadowbrook Circle, Knoxville, TN

- Steven Goforth, last known staying with the Bouviers at 225 Nicely Trail, Knoxville, TN
- Stephanie Hatmaker, a/k/a “Boodles” (“HATMAKER”)

GALYON also stated that HATMAKER’s husband is a taxi driver that “Fuji” frequently uses for transportation.

11. GALYON stated that “Fuji’s” phone number was stored as “My #1” in the phone that was seized from her during the arrest in September of 2018. In the extraction conducted on the phone from September, the contact named “My # 1” was telephone number 313-695-9560. There were numerous incoming and outgoing text messages with numerous contacts that were corroborative of the information provided by GALYON during the interview, including eight SMS messages exchanged with “My # 1.” In addition, the text messages on the extraction confirm conversations concerning drug activity between GALYON and drug users. Also, during the interview, GALYON identified the Facebook page of “Fuji.”

FUJI FACEBOOK INFORMATION

12. Following the interview with GALYON, law enforcement utilized an undercover Facebook account to publicly view the Facebook page for “thereel jeddoe,” the Facebook account identified by GALYON belonging to “Fuji.” The profile picture associated with the page is a black male that matches the physical description of “Fuji,” as provided by GALYON and GOFORTH. In the “about” section of the page, it lists the user’s date of birth as February 2, 1985. The “about” section also shows the telephone number for the user as 865-963-2095, the same number found in GOFORTH’s phone as “Fugi.” Upon searching various open source and law enforcement databases, it was found that Damion Knox has date of birth February 2, 1985 from Detroit, MI, with a relative named Darious Knox. According to the Michigan Department

of Corrections Offender Tracking Information System (OTIS), the photograph of Damion Knox appeared to be the same person as the profile picture for the Facebook account identified as that of Fuji, "thereel jeddoe." OTIS indicated that Damion Knox, a/k/a "Fuji" ("FUJI"), has multiple felony controlled substance distribution convictions in the state of Michigan. Also, the Michigan driver's license photograph of Damion Knox was the same person that GALYON had identified as FUJI.

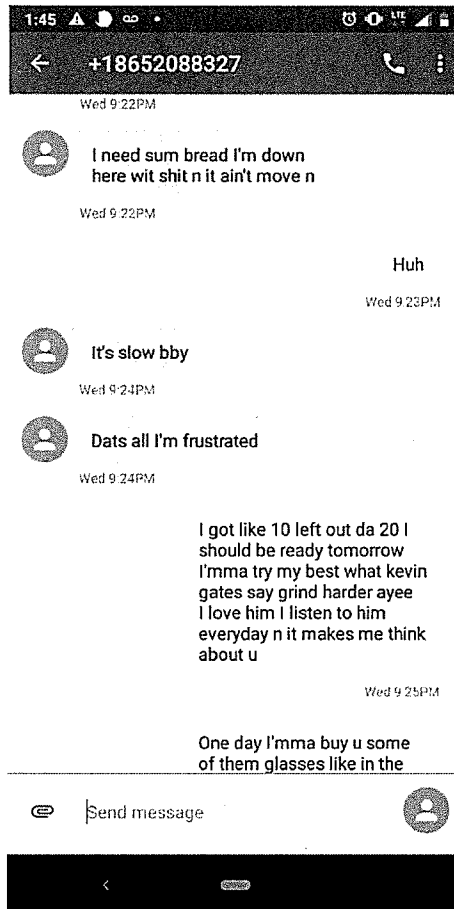
HATMAKER INTERVIEWS

13. On January 14, 2019, KPD investigators interviewed HATMAKER regarding her involvement in the overdose death of Martina Tyler ("TYLER"). During the interview, HATMAKER confessed to selling the heroin to TYLER that likely caused her death. HATMAKER said she obtained the heroin from a black male with a light complexion she knows as "Fuji." She stated FUJI stays at various hotels or at an apartment somewhere off of Old Rutledge Pike. She said that he typically uses taxicabs for transportation. HATMAKER stated she was obtaining eight grams of heroin from FUJI three times per week at a price of \$100 per gram. She stated he would typically provide the heroin up front and expect payment when he re-supplied her later in the week. HATMAKER also provided that FUJI used telephone number 865-385-1991.

14. On January 30, 2019, law enforcement again interviewed HATMAKER while she was in custody at the Knox County Detention Facility regarding FUJI. During this interview, HATMAKER provided more detailed information regarding FUJI's activities. HATMAKER stated she had met FUJI to purchase heroin at an apartment building on John Sevier School Road. Based on her description of the apartment building, investigators determined that it was

1423 John Sevier School Road, Knoxville, TN. HATMAKER stated that it was her understanding that FUJI stayed in one of the apartments there periodically. HATMAKER was shown the Michigan driver's license photograph of Damion Knox and identified him as the person she knew as FUJI.

15. On February 21, 2019, HATMAKER was released from custody with an agreement to cooperate with law enforcement in this investigation. On February 26, 2019, she made contact with a KPD investigator and advised that she had just met with FUJI. HATMAKER stated that FUJI had brought her approximately 20 grams of heroin for her to distribute. HATMAKER stated that FUJI was now using telephone number 865-208-8327. She further stated that she had a series of text messages with FUJI that were incriminating and would corroborate the information she had provided in previous interviews. HATMAKER sent "screen shots" of the text exchange to the KPD investigator. The KPD investigator then met with HATMAKER and took custody of the suspected heroin. The drugs were sent to the TBI Lab for testing and the substance was found to be a combination of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance. The following is an example of just one of the approximately 30 screen shots sent to the KPD investigator:



Based on my training and experience, this text exchange indicates that FUJI is complaining about having heroin and not being able to sell it fast enough. HATMAKER's response indicates that she has 10 grams left of the 20 grams she previously obtained from FUJI and would be able to sell that amount and need additional heroin the next day.

ASHLEY RHYNES INTERVIEW

16. On January 31, 2019, KPD investigators interviewed Ashley Rhynes ("RHYNES") who was in custody on an unrelated charge. RHYNES stated she purchases heroin from Jama Collier ("COLLIER") who lives in an apartment at 1423 John Sevier School Road. RHYNES said that Jama COLLIER lives in the top right apartment and is supplied heroin by a black male from

Detroit who uses the nickname "Fuji." RHYNES stated it is her understanding that FUJI rents the apartment directly across from COLLIER and uses it to store heroin. She said that FUJI stays with COLLIER some nights. In December 2018, COLLIER provided 1423 John Sevier School Rd. as her address during a court appearance in Knox County Criminal Court.

CHASITY ANDERSON TRAFFIC STOP AND INTERVIEW

17. On March 11, 2019, a KPD officer conducted a traffic stop on a vehicle he observed leaving BERRY's residence at 1715 Connecticut Ave., the same residence that GALYON was leaving when she was arrested. The driver of the vehicle, Chasity Anderson ("ANDERSON"), failed to stop at a stop sign. During a consent search of ANDERSON's vehicle and person, officers found a total of approximately 20 grams of a substance believed to be heroin, a notebook containing a ledger of monies owed for certain amounts of drugs, a digital scale, and \$1,578 in U.S. currency. During the course of the traffic stop, ANDERSON stated she sells heroin and admitted to dropping off approximately 1.5 grams of heroin at BERRY's residence. ANDERSON agreed to cooperate and was transported to the detention facility.

18. The following morning, March 12, 2019, ANDERSON met with law enforcement, was advised of her Miranda rights, and voluntarily provided a statement. At the beginning of the interview, ANDERSON indicated that she "dated" one of the "main guys" of the "Detroit boys". When asked who it was, she responded "Darnes Turner." ANDERSON stated that in October of 2018, she was obtaining heroin from Josh Cooper ("COOPER") at an apartment on Watauga Drive in north Knoxville. She stated while at COOPER's apartment she met who she came to know as Darnes Turner ("TURNER"). She stated TURNER made a proposition to her regarding her selling heroin for him. ANDERSON said she took TURNER up on the proposition and

began obtaining heroin from him that she then sold. ANDERSON said she was then introduced to "Fuji," who she was told was TURNER's brother. Anderson said FUJI was the source of supply for TURNER and that she frequently communicated with both FUJI and TURNER. She indicated that at some point during their relationship, she became romantically involved with TURNER. ANDERSON said when she first began selling heroin for TURNER, she was given a customer base by TURNER and FUJI. She said in the beginning, she was given 10 grams of heroin per day by TURNER and FUJI. She stated the heroin was "fronted" to her with the expectation that she would pay them back at the price of \$100 per gram, and that she sold the heroin for \$125 -\$150 per gram and kept the profits. ANDERSON said she quickly escalated to obtaining 40 grams of heroin per day from FUJI and TURNER. ANDERSON stated she has been living in various hotels throughout Knoxville and that she both delivered heroin and had customers come to her hotel rooms. She said every night, TURNER or another "runner" would bring the heroin to her hotel room and pick up the money from that day's sales. She also provided that TURNER, FUJI and other runners almost exclusively traveled in Paradise taxicabs.

19. ANDERSON stated several weeks prior to the interview, she and TURNER ended their romantic relationship. She knew that TURNER was living in a white double-wide mobile home on McIntyre Road in east Knoxville with a girlfriend named "Tara." ANDERSON stated around the time she stopped dating TURNER, she was introduced to a new runner, who she only knew as "Squirrel." She said "Squirrel" took over the duties of delivering the heroin and picking up the money. Her description of "Squirrel" was a young, heavy set black male who she believed was from Detroit, MI. ANDERSON stated the heroin seized from her during the arrest was what was left of 40 grams delivered to her the night before by "Squirrel" and that the money seized was the proceeds of the heroin sales she had made that day. ANDERSON said "Squirrel"

delivered the heroin to her at her motel room sometime after midnight the night prior to the arrest and that he came into her hotel room to deliver the drugs. She said she talked to FUJI every day on the phone and that FUJI's phone number was stored in her phone as "Lil Bro," TURNER was stored as "DT," and "Squirrel" was saved as "DT's Cuz."

20. ANDERSON stated when she was first introduced to FUJI, he and TURNER were living with a female named "Jama" at a four-plex apartment building somewhere off of Rutledge Pike. She provided that they had recently moved due to their belief that they had drawn the attention of law enforcement. She said that they moved to a house on E. Quincy Avenue, near N. Central St. It was also her understanding that FUJI had a girlfriend that lived somewhere in an apartment off Middlebrook Pike and that he frequently stayed with her.

21. ANDERSON agreed to accompany officers to the East Quincy Avenue area and attempt to point out the house being used by FUJI. Investigators drove with ANDERSON to the area where she identified TARGET LOCATION B as the residence. ANDERSON stated that she had dropped TURNER off at that residence within the past two weeks and watched him enter the house. She said she specifically remembered a "Private Parking" sign in the front yard near the driveway. ANDERSON was shown a series of photographs of individuals believed to be involved in the conspiracy, including a photograph of Damion Knox. Anderson identified the photograph of Damion Knox as the person she knew as FUJI.

22. ANDERSON said she has seen FUJI and TURNER with up to two kilograms of heroin at the apartment off of Rutledge Pike. She further stated FUJI told her he was approaching one million dollars in profit from drug sales. She stated it is her understanding that FUJI goes to Detroit to get the heroin himself and drives it back to Knoxville or has someone drive him. She

stated he has several other people in his employ that work much in the same manner as she does. ANDERSON also knew that GALYON, HATMAKER and a white male known only as "JJ" were selling heroin for FUJI. She stated "JJ" was selling from an apartment in the back of a house on Midlake Drive. She further stated that after HATMAKER, a/k/a "Boodles," was released from jail, FUJI gave her \$2,000. This is corroborative of the incident in which HATMAKER contacted investigators and turned over the 20 grams of heroin, which would be worth \$2,000 at the \$100 per gram price.

23. ANDERSON voluntarily consented to a search of her phone. The information extracted from ANDERSON's phone corroborated her statement and indicated that she was involved in the distribution of heroin with this drug trafficking organization. Upon further review of the content of ANDERSON's phone, investigators found a contact named "Baby Bro" and a contact named "Lil Bro". The number for "Baby Bro" was 865-208-8327, the same number provided by HATMAKER as a number for FUJI. The number for "Lil Bro" was 865-242-9142. The report reflected that ANDERSON used the 208 number for "Baby Bro" to communicate from February 26, 2019 to March 4, 2019. All texts with that number ended on March 4, 2019. On March 5, 2019, text communication began with the 242 number, the contact named "Lil Bro," and continued until ANDERSON's arrest on March 11, 2019. There are also numerous text exchanges that corroborates ANDERSON's statements regarding her distribution of heroin with "Squirrel" at telephone number 313-574-5582. The following is a series of text exchanges between ANDERSON and FUJI (Baby Bro and Lil Bro), as just one example of what is believed to be discussion of drug distribution within the organization:

1	Sent	To 8652088327 Baby Bro*	2/26/2019 6:05:57 PM(UTC-5)		Sent	Do you know about the Brian Horner guy that your brother was f***** with	Yes Carved: Yes
		Direction: Outgoing					
2	Sent	To 8652088327 Baby Bro*	2/26/2019 6:07:00 PM(UTC-5)		Sent	They got him today and have had JJs Road closed down chasing him down so he hasn't been able to do nothing all day.	Yes Carved: Yes
		Direction: Outgoing					
3	Inbox	From 8652088327 Baby Bro*	2/28/2019 3:57:15 PM(UTC-5)		Read	Yooooo	Yes Carved: Yes
		Direction: Incoming					
4	Sent	To 8652088327	2/28/2019 3:57:45 PM(UTC-		Sent	What's up	Yes Carved:

		Baby Bro*	5)				Yes
		Direction: Outgoing					
5	Sent	To 8652088327 Baby Bro*	2/28/2019 4:01:32 PM(UTC-5)		Sent	I just want u to know I've not went to bed yet and dropped price to try to get rid of more..I was already cheapest around but I'm doin whatever to make u happy and I'm very loyal I hope u see that!!!! A little time and I will be back up I promise	Yes Carved: Yes
		Direction: Outgoing					
6	Inbox	From 8652088327 Baby Bro*	2/28/2019 4:17:03 PM(UTC-5)		Read	I kno	Yes Carved: Yes
		Direction: Incoming					
7	Inbox	From 8652088327	2/28/2019 4:17:13 PM(UTC-		Read	That's y I'm bout to help u get u a crib a real house here in knox	Yes Carved:

		Baby Bro*	5)				Yes
		Direction: Incoming					
8	Sent	To 8652088327 Baby Bro*	3/4/2019 2:24:43 PM(UTC-5)		Sent	And no I didn't get to look at the room I've had this room till tomorrow paid-up so just stayed here she had me so mad last night I was shaking and yelling and I can't have s*** like that going on at a motel for cops to get called. I just can't f how she talk to me after all I've done for her the last few days I spent alot on her and tried to show her a different way I have lost so she didn't have to go out on dates	Yes Carved: Yes
		Direction: Outgoing					
9	Sent	To 8652088327 Baby Bro*	3/4/2019 4:46:00 PM(UTC-5)		Sent	Tanyas on phone said can u give her at least 50 by tomorrow night. She thought she had more money than she does	Yes Carved: Yes

		Direction: Outgoing					
1	Sent	To 8652429142 Lil Bro*	3/10/2019 1:32:00 AM(UTC-5)		Sent	I got u tomorrow tho I don't ever be shorting u....I'm back in business now so no worries😊😊😊	Yes Carved: Yes
		Direction: Outgoing					
2	Inbox	From 8652429142 Lil Bro*	3/10/2019 1:35:15 AM(UTC-5)		Unread	I'm work n on u and boogie a crib	Yes Carved: Yes
		Direction: Incoming					
3	Sent	To 8652429142 Lil Bro*	3/10/2019 11:52:55 PM(UTC-4)		Sent	I'm getting pissed for real squirrel is telling me I can't turn their phones off after they fucked me like they did. I just paid 170\$ phone bill...it's not rite and idk why I have to continue paying a bill for someone that done	Yes Carved: Yes
		Direction: Outgoing					

5	Sent	To 8652429142 Lil Bro*	3/11/2019 2:07:46 AM(UTC-4)		Sent	I have ur 60\$ from last night too but squirrel had me so damn mad I didn't even remember to give to him. I had tears in eyes and nol has made me that mad n long time...I told him to just leave me alone n let me calm down but he kept pushing me thinking that was ok. Idk why ppl do me the way they do when I'm so good to every1	Yes Carved: Yes
6	Sent	To 8652429142 Lil Bro*	3/11/2019 10:31:29 AM(UTC-4)		Sent	U should tell squirrel to stop being mean to me. He kept pushing me. My friend knows me n thought I was gonna snap on him...he was doin it purposely knowing how mad I was n I told him to leave me alone for a min	Yes Carved: Yes
7	Sent	To 8652429142	3/11/2019 10:34:09 AM(UTC-		Sent	He literally had me in tears when he left and that's when I'm really mad...I know	Yes Carved:

		Lil Bro*	4)			he's young and immature but damn..	Yes
		Direction: Outgoing					
8	Sent	To 8652429142 Lil Bro*	3/11/2019 10:38:52 AM(UTC-4)		Sent	And if JJ sold 20 yesterday it was only because he paid for it out of his own pocket there's no way he's still doing that	Yes Carved: Yes
		Direction: Outgoing					

Based on training and experience, I believe that these text exchanges are indicative of ANDERSON and “Baby Bro/Lil Bro” being engaged in a conspiracy to distribute controlled substances. Furthermore, the text message regarding “JJ” and “Squirrel” are corroborative of the information provided by ANDERSON as detailed above.

24. Following ANDERSON’s interview, she was transported back to the detention facility. ANDERSON was released on bond later that night. ANDERSON has continued to cooperate and provided information throughout the course of the investigation. During later interviews with ANDERSON, she advised that following her release from jail, she had obtained heroin from FUJI and “Squirrel”. She stated they recently stopped using rental cars and began using a white car with a Maine license plate. She stated that “Squirrel” always rode in the back seat and the vehicle was always being driven by a very tall, thin black male who spoke with an accent. She

stated that she believed he was likely from an African nation based on his accent. ANDERSON stated that since her arrest, she has met with "Squirrel" and the tall black male at the Krystal's on N. Broadway and the Sparkle Clean Car Wash on Central Avenue Pike. ANDERSON stated they prefer to meet at the car wash. ANDERSON said that since her arrest, she was obtaining approximately 10 grams of heroin per day from this DTO and selling all of it to a male by the name of Nathan Rogers ("ROGERS") who lives in a trailer park in Maryville. Based on this information, officers made contact with an agent with the 5th Judicial District Drug Task Force in Blount County. The agent advised that the 5th DTF has conducted two controlled buys of heroin from ROGERS in Maryville on February 28 and March 8, 2019. The drugs were from both controlled buys were sent to the TBI Lab for testing and found to be a combination of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

25. ANDERSON further stated "JJ," whom she had discussed during her previous interview, had taken over her customer base after she was arrested and was obtaining 70-80 grams of heroin per day that he was distributing from his residence at TARGET LOCATION C. She stated "JJ" lived in the "back left" apartment of TARGET LOCATION C, if facing the back of the apartment from the alley. She said customers frequently use the alley and pull into the back yard of the residence to access the apartment. ANDERSON provided a phone number used by "JJ" as 423-561-5035. Investigators entered that phone number in Facebook Messenger and found it to be associated with a Facebook page with the profile name of Jason McBride. While perusing the publicly viewable portion of the Facebook page for Jason McBride, officers observed a photograph of a marriage license with the name Jerry Joseph Jordan with the date of birth as September 3, 1968. Investigators then obtained a driver's license photograph of Jerry Joseph

Jordan ("JORDAN") the date of birth of September 3, 1968, and presented it to ANDERSON.

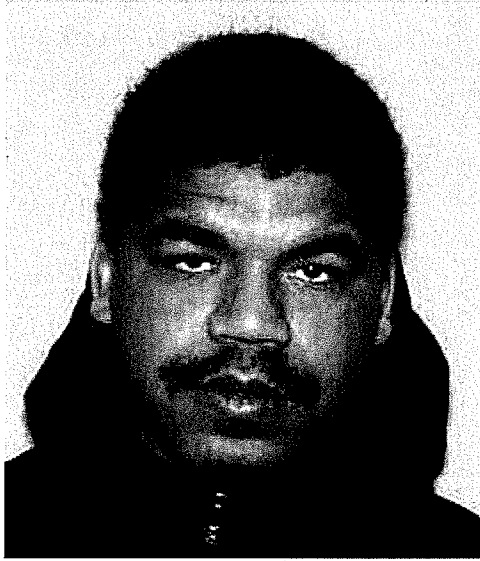
Anderson identified the photograph of JORDAN as the person she knew as "JJ".

26. ANDERSON stated COOPER, who both she and GALYON implicated in their earlier statements, had moved from Watauga Drive to a residence at 8999 Childress Road.

ANDERSON stated it was her understanding that COOPER was obtaining multi-gram quantities of heroin from this DTO for further distribution.

SQUIRREL FACEBOOK INFORMATION

27. Investigators entered the phone number stored in ANDERSON's phone as "DTcuz" (313-574-5582) into Facebook Messenger and found that it was associated with a Facebook profile named "Perky Jbo." The profile picture associated with "Perky Jbo" is a young heavy-set black male that matches the physical description of "Squirrel" as provided by ANDERSON. The profile picture is of the male holding what appears to be a very large stack of currency to the side of his head. A search of the phone number in various open source and law enforcement databases revealed that the number was associated with a black male from Detroit, MI named Jeremiah Johnson. Officers obtained a MI driver's license photo of Jeremiah Johnson and observed that Jeremiah Johnson appears to be the same person as the profile picture of "Perky Jbo." Furthermore, ANDERSON was later shown the driver's license photograph of Jeremiah Johnson and identified him as the person she knows as "Squirrel". Below is the driver's license photograph of Jeremiah Johnson ("SQUIRREL") and the profile picture of his Facebook profile of "Perky Jbo":



POLE CAM AND TRACKER INFORMATION

28. On March 15, 2019, investigators began conducting electronic surveillance via a “pole cam” at TARGET LOCATION B, the residence that ANDERSON advised was being used by SQUIRREL. Upon viewing the pole cam in real time, reviewing video captured via the pole cam, and conducting physical surveillance, officers have observed SQUIRREL and a tall, thin black male discussed in interviews of ANDERSON, later identified as Papa Diop, a/k/a “Too Tall” (“DIOP”), coming and going from the residence. They are seen on the pole cam making frequent trips back and forth from the residence almost every day. The two males follow a similar pattern almost every time they leave and return to the residence. On most occasions, DIOP exits the house first and approaches the vehicle in which they are going to travel. After DIOP reaches the car, SQUIRREL exits the residence and approaches the vehicle. DIOP always drives and SQUIRREL gets into the back seat. When the vehicle returns, DIOP exits the vehicle first and approaches the residence. Once DIOP reaches the door, SQUIRREL exits the back seat of the vehicle. DIOP frequently appears to use a key and open the front door. They both then

enter the residence. The surveillance indicates that both SQUIRREL and DIOP were residing at TARGET LOCATION B until April 8, 2019, when they appeared to change locations.

However, during the course of the investigation, DIOP has been observed returning to TARGET LOCATION B and using a key to enter the residence even after they appear to have moved out, thus indicating that members of the DTO still have access to the house at TARGET LOCATION B. Since April 8, 2019, DIOP is the only individual that has been seen entering TARGET LOCATION B.

29. During the course of the investigation, officers have observed SQUIRREL and DIOP use three different vehicles in the same manner as described above. The first vehicle was a black Mitsubishi Outlander. During one surveillance operation on March 19, 2019, a faded "Uber" rideshare sticker was observed in the rear window of the Mitsubishi Outlander. A check of the Tennessee registration of the Mitsubishi revealed it was an Avis rental vehicle. Information received from Avis Rental Cars pursuant to a subpoena revealed that the Mitsubishi Outlander was rented to Papac Diop with a Michigan address. Investigators conducted a search of variations of the name Papac Diop in an open source database and found the name Papa Diop associated with 1423 John Sevier School Rd. During the course of the investigation, officers obtained a Michigan driver's license for DIOP and observed that the photograph appeared to be the same individual driving the rental vehicles in this case. On March 23, 2019, investigators observed SQUIRREL and DIOP traveling in a black Buick registered to Crystal Bowman. Later on that date, the black Buick arrived at the residence closely followed by a white Nissan Versa with a Maine tag. SQUIRREL and a female exited the black Buick. DIOP was observed exiting the driver's seat of the white Versa. The female left driving the black Buick and SQUIRREL

and DIOP entered the residence. Since that time, SQUIRREL and DIOP have been traveling in the manner described above in the white Nissan Versa. The white Versa is registered to Hertz Rental Cars. Information obtained pursuant to a subpoena showed that the vehicle was rented by Crystal Bowman. During multiple surveillance operations, officers have observed an illuminated ride-share light mounted in the front windshield of the vehicle.

30. Pole cam footage has also captured a person believed to be FUJI coming and going from TARGET LOCATION B in a silver Nissan Maxima bearing Tennessee Registration 0M56Y4. The vehicle is registered to Shadeja Chandler, a/k/a "Lola" ("CHANDLER"). During a surveillance operation on March 19, 2019, officers observed FUJI at the residence in the silver Maxima. Officers were able to follow Knox from TARGET LOCATION B to a residence at TARGET LOCATION A. Information received pursuant to the Knoxville Utilities Board revealed that CHANDLER has utilities in her name at TARGET LOCATION A.

31. On March 25, 2019, a federal search warrant from this Honorable Court, for geolocation data for telephone number (865) 242-9142 associated with FUJI. On that same day, this Court also issued an order for the installation and use of pen registers and trap and trace devices for that same phone and telephone number (313) 574-5582, associated with SQUIRREL. The telephone associated with FUJI was turned off during much of the period of authorized geolocation data, but on March 31, 2019, beginning at approximately 5:06 p.m and continuing through approximately 9:36 p.m., the telephone was turned on and agents received multiple GPS location data in the vicinity of TARGET LOCATION A. The geolocation data indicated that the locations provided had an accuracy of within approximately 1500 meters.

32. On April 4, 2019, investigators with KPD's Organized Crime Unit, with assistance from agents with the TBI, installed a court authorized GPS tracking device on the 2018 Nissan Versa with Maine tag 9442WF. The GPS tracker allows officers to track the vehicle in real time and to review the historical location of the vehicle. Upon reviewing the data collected from the tracking device, pole cam footage, and physical surveillance, officers have been able to identify numerous locations visited by SQUIRREL and DIOP. The tracker did have a battery malfunction and stopped reporting on April 12, 2019. It was replaced with an operational device on April 15, 2019. The information from the tracking device indicated that the Nissan Versa made eleven (11) visits to TARGET LOCATION A between April 4 and April 16, 2019 (there was no tracker information between April 12 at approximately 1:30 p.m. and April 15 at approximately 4:30 a.m.). Based on witness statements, physical surveillance, and tracker information, it is believed that TARGET LOCATION A is the residential address of FUJI, the primary source of supply for the DTO. In addition to TARGET LOCATION A, the tracking device has placed the vehicle at the following locations of interest on several occasions, often several times per day:

- TARGET LOCATION C (in the alley behind residence) – this corroborates info from ANDERSON regarding the residence of JORDAN, who is supplied up to 80 grams of heroin per day by this DTO for further distribution
- 8999 Childress Road, Knoxville, TN – this corroborates info from ANDERSON regarding the residence of COOPER, who allegedly obtains multiple gram quantities of heroin from this DTO for further distribution. This is further corroborated by incriminating text messages in both ANDERSON and GALYON's phones
- 5504 Central Ave Pike, Knoxville, TN – Sparkle Clean Car Wash – this corroborates information from Chasity ANDERSON that this DTO uses this location as a location to meet customers for re-supply purposes

- 5335 Central Ave Pike, Knoxville, TN – Clarion Inn – officers observed the rental vehicle at the location during a surveillance operation and observed SQUIRREL waiting in the back seat while DIOP went into the hotel and soon returned, further corroborating the information from several cooperators that this DTO uses the hotels in the North Knoxville area for distribution
- 208 Market Place Blvd, Knoxville, TN – Red Roof Inn – this corroborates information from cooperators that this DTO meets mid-level dealers at local hotels to re-supply them with heroin and pick up money
- 258 Harry Lane Blvd, Knoxville, TN – Motel 6 – this also corroborates information from cooperators that this DTO meets mid-level dealers at local hotels to re-supply them with heroin and pick up money
- 5334 Central Avenue Pike, Knoxville, TN – Red Roof Inn – this again corroborates information from cooperators that this DTO meets mid-level dealers at local hotels to re-supply them with heroin and pick up money
- 5110 McIntyre Road, Knoxville, TN – this corroborates information from ANDERSON that FUJI's brother and co-conspirator TURNER lives at the double-wide trailer on McIntyre Road
- 1423 John Sevier School Road, Knoxville, TN – this is believed to be the residence of COLLIER. This corroborates information obtained from RHYNES regarding FUJI possibly having two apartments and supplying COLLIER with heroin. This also corroborates information from ANDERSON and HATMAKER who stated that FUJI and the other members of the conspiracy were operating out of an apartment on John Sevier School Road before moving to TARGET LOCATION B

33. On April 8, 2019, officers observed unusual activity taking place at TARGET LOCATION B via the pole cam. Officers observed DIOP pull the Versa up to the front door of the residence. He and SQUIRREL then hurriedly began loading items from within the residence

into the vehicle. After essentially filling the vehicle with items from the residence, they left in the Versa. After making a couple stops, the tracking device indicated that they went to 1423 John Sevier School Road. Since that time, it appears that they are living and operating out of 1423 John Sevier School Road much the same as they were at TARGET LOCATION B. The tracking device indicates that the Nissan Versa returns to 1423 Johns Sevier School Road several times throughout the day and spends most over-nights at that location. The tracker and pole cam have shown that DIOP has returned to the residence at TARGET LOCATION B even after they have appeared to start staying on John Sevier School Road. The visits were short in nature but it did appear that DIOP used a key to open the front door, indicating that they still have dominion, control, and access to the residence. The last time the tracking device placed the Nissan Versa at TARGET LOCATION B was April 12, 2019 at approximately 1:30 a.m.

34. On April 10, 2019, the tracking device indicated that the Nissan Versa was northbound on I-75 out of Knox County. Upon reviewing the historical information the next day, it appeared that the Nissan Versa traveled to the Greyhound Bus Station in Cincinnati, OH. The Nissan was in Cincinnati for less than two hours and appeared to travel to various convenience stores and restaurants after leaving the bus station. The Nissan Versa then traveled directly back to Knoxville and went directly to TARGET LOCATION A, arriving at approximately 2:30 am on April 12, 2019. After approximately 30 minutes, the Nissan Versa left TARGET LOCATION A and went to a residence at 3235 Wilderness Road, Knoxville, TN, where it stayed for the remainder of the night. The following morning, the vehicle returned to 1423 John Sevier School Road. I know from my training and my experience with many Detroit based heroin distribution investigations that drug couriers commonly use the Greyhound Bus Lines as a method of

transportation for heroin. I further know from the Greyhound Bus online schedule for April 11, 2019, two buses from Detroit, MI to Cincinnati, OH arrived at 7:25 p.m. and 8:50 p.m. The information from the tracking device indicated that the Nissan Versa arrived at the bus station in Cincinnati at approximately 7:50 p.m. and departed Cincinnati at approximately 11:30 p.m. bound for Knoxville.

35. On April 11, 2019, investigators installed a court authorized GPS tracking device on the silver Nissan Maxima being driven by FUJI. The information obtained from the tracking device, as well as physical surveillance operations, indicates that FUJI resides at TARGET LOCATION A. The tracking device indicates that the Nissan Maxima known to be driven by FUJI comes and goes frequently from TARGET LOCATION A and spends most over-nights at that location. According to the GPS tracker on the vehicle driven by FUJI, on April 19, 2019, FUJI left TARGET LOCATION A at 9:45 am after spending the night at that location and traveled to Gold's Gym. Officers then witnessed FUJI get into the vehicle at Gold's Gym in Knoxville, TN and return to TARGET LOCATION A. In addition, CHANDLER has one elementary school aged child. Almost every weekday since the tracker has been installed, the vehicle has also traveled to Pond Gap Elementary School in Knoxville, TN. Based on the investigation, I believe FUJI is living with CHANDLER at TARGET LOCATION A. Both FUJI and CHANDLER are believed to be engaged in the DTO. In addition, since the installation, the tracking device has shown that the Maxima was present at TARGET LOCATION A during several visits by the Nissan Versa. The tracking device has also shown multiple visits to 5110 McIntyre Road, believed to be the residence of TURNER.

36. On April 10, 2019, investigators conducted a surveillance operation at TARGET LOCATION C. During the surveillance operation, officers observed multiple vehicles coming and going from the driveway in the rear of TARGET LOCATION C. All of the vehicles that visited TARGET LOCATION C pulled into the alley behind the residence, parked in the yard, and the occupants approached the apartment in the rear of the residence. The visits were very short in duration, usually less than five minutes. The volume of traffic was excessive for a residential location, even for a residence divided into apartments. Based on my training and experience, I believe that this activity is consistent with drug sales from a residential location.

37. On April 12, 2019, patrol officers with the Knox County Sheriff's Office (KCSO) encountered an individual at 2709 Rifle Range Rd in Knox County, TN. The individual, whose identity is known to law enforcement but withheld for his/her protection, was found to be in possession of a small amount of suspected heroin (approximately .22 grams). The individual told the officers that he/she had just purchased the heroin from a white male named "JJ" at TARGET LOCATION C. The individual was issued a misdemeanor citation and released. The small amount of suspected heroin was seized by the KCSO.

38. On April 14, 2019 officers with the Maryville, TN Police Department responded to a residence in Maryville on a drug overdose call. Upon their arrival, they found the victim in respiratory distress and unconscious. The officers administered Naloxone to the victim, who regained consciousness. The officers contacted the 5th Judicial Drug Task Force to follow-up with the overdose investigation. The investigative report indicates that the confidential source and ROGERS went to the "Merchants Road Area" to meet with "JJ" at TARGET LOCATION C and received drugs that we have reason to believe led to this overdose.

39. On April 17, 2019, officers with the KPD and the TBI conducted a surveillance operation at TARGET LOCATION C. Between the hours of approximately 12:30 p.m. and 7:00 p.m., officers observed as approximately 25 vehicles, some with multiple occupants, visited TARGET LOCATION C. The vast majority of the visitors parked in the rear of the residence, approached, and entered the apartment on the west side of the rear of the house. Most of the visits were short in duration. Based on my training and experience, this is an unusual volume of traffic and is indicative of drug sales taking place at a residential location. During the surveillance operation, officers only observed one individual enter and exit the door on the right (east) side of the rear of TARGET LOCATION C. While conducting the surveillance operation, the following incidents occurred:

a. At approximately 4:15 p.m., officers observed as a blue Honda bearing Tennessee registration P2129R pulled into the driveway in the rear of TARGET LOCATION C. The driver exited the vehicle, approached the door on the west side of the rear of the residence, and entered the apartment. After less than five minutes, the driver exited the apartment on the west side of the rear of the residence and re-entered the driver's seat of the blue Honda. The vehicle then exited the driveway and drove to the Fountain City Duck Pond located at 5237 N. Broadway, which is a short distance from TARGET LOCATION C. Officers observed as a female and small child exited the vehicle, but the driver remained in the driver's seat. Officers noted that the vehicle had crossed the center line to park illegally and the registration on the vehicle was not current. An officer approached the vehicle and observed the driver attempting to inhale a substance into his/her nose. Upon seeing the officer, the driver threw something into the floorboard and quickly exited the vehicle. The driver, whose identity is known to police but is

being withheld for his/her protection, consented to a search of his/her person which resulted in the discovery of a small cut plastic straw commonly used to inhale heroin. The driver admitted to inhaling heroin as the officer was approaching and throwing the remaining heroin into the floorboard. A drug detection canine (K-9) responded to the scene and conducted a free air sniff around the vehicle. The K-9 alerted to the odor of controlled substances and a search was conducted. The officer found a residual amount of what appeared to be heroin in the driver's floorboard. The driver voluntarily informed the officer that he/she had just purchased heroin from a white male he/she only knew as "JJ" from a house nearby. The driver offered to point out the house if the officer would transport him/her to the area. The officer placed the driver in his patrol car and followed the directions provided by the subject. The driver of the blue Honda pointed out the rear of TARGET LOCATION C as being the house and pointed out the apartment on the west side of the rear of the residence as the location where he/she purchased heroin from "JJ."

b. At approximately 5:15 p.m., officers observed a Dodge Ram pickup truck with a tool box and ladder in the bed pull into the rear driveway of TARGET LOCATION C. Officers observed as the two occupants of the vehicle exited and approached the west side of the rear of the residence. Due to their surveillance position, the officers were unable to see the occupants actually enter the door on the west side of the rear of the residence, but they were observed approaching that location. After a short period of time, the two males returned to the Dodge Ram and got into the vehicle. The vehicle exited the alley behind the residence and traveled west on Cedar Lane. The vehicle turned north onto Parkdale Road where it was observed exceeding the speed limit by approximately 15 mph. An officer conducted a traffic stop on the

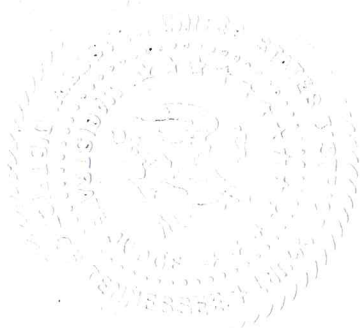
vehicle at 6530 Fountain City Road. The driver, Clifford Johnson, was found to be in violation of the Habitual Motor Vehicle Act and was arrested on that felony offense. A drug detection K-9 responded to the scene of the stop and conducted a free air sniff around the vehicle. The K-9 alerted to the odor of controlled substances around the vehicle and a search was conducted. While speaking to the passenger, Clifford Lowe, the assisting officer noticed a small yellow bag on the running board on the passenger side of the vehicle. When asked about the bag, Clifford Lowe stated that it was his. A search of the bag resulted in the discovery of a small amount of methamphetamine. During the search of the vehicle, officers discovered hypodermic syringes commonly used to inject heroin and meth, as well as a spoon with burnt residue, commonly used to prepare heroin for injection.

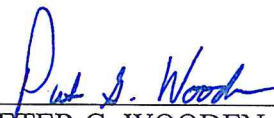
40. Based on the evidence presented in this affidavit from the investigation of the DTO, involving FUJI, SQUIRREL, TURNER, DIOP, COLLIER, and others known and unknown, there is probable cause to believe these individuals are engaged in an ongoing criminal enterprise and that the residences at TARGET LOCATION A, TARGET LOCATION B, and TARGET LOCATION C have been and are currently being used to maintain, store, and distribute controlled substances and the other contraband property described above. Based on my training and experience, I believe that the search of these residences will result in the discovery of evidence of the aforementioned criminal activity.

CONCLUSION

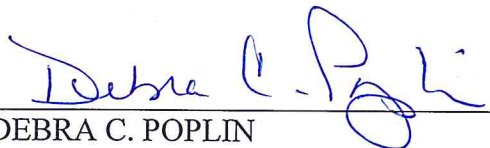
Based on the foregoing, we respectfully request this Honorable Court to authorize a search of residences at TARGET LOCATION A, TARGET LOCATION B, and TARGET LOCATION C, as there is probable cause that they contain evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 846, and 841(a)(1), and Title 18, United States Code, Section 922, as further described in Attachment D.

Respectfully submitted,




PETER G. WOODEN
Special Agent
DEA

Subscribed and sworn to before me on this 19th day of April, 2019


DEBRA C. POPLIN
United States Magistrate Judge